

FILED IN COURT
ON 2/25/21 BG
Court Clerk
Eastern District of NC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
NO. 5:21-CR-08-1(1)
NO. 5:21-CR-08-2(1)

UNITED STATES OF AMERICA)

v.)

INDICTMENT

2/25/21 BG
Std
BENJAMINE JR MOSS,
^E

a/k/a "BJ"; and

DENTREZ RANDELL THOMAS,

a/k/a "Duwop".

) Name amended in open court by order
) 4/1/2021 to reflect:

) BENJAMINE MOSS, JR.- aka "BJ"

The Grand Jury charges that:

COUNT ONE

Beginning in or around November of 2017, the exact date being unknown to the Grand Jury, and continuing up to and including in or around February of 2021, the defendants, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute one hundred (100) grams or more of heroin, a quantity of acetyl fentanyl, and a quantity of marijuana, Schedule I controlled substances, and a quantity of a mixture and substance containing fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about July 24, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE

On or about July 24, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a Court of the United States, as charged in Count Two of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT FOUR

On or about July 25, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about October 24, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIX

On or about October 29, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about November 1, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly

and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHT

On or about December 5, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINE

On or about December 13, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of acetyl fentanyl, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TEN

On or about December 19, 2019, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about January 3, 2020, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin and acetyl fentanyl, Schedule I controlled substances, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

On or about January 17, 2020, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a

detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about January 31, 2020, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin and acetyl fentanyl, Schedule I controlled substances, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about February 14, 2020, in the Eastern District of North Carolina, the defendant, BENJAMINE JR MOSS, also known as "BJ," and DENTREZ RANDELL THOMAS, also known as "Duwop," aiding and abetting each other, did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Forfeiture Money Judgment:

- a) A sum of money representing the gross proceeds of the offense(s) charged herein, in the amount of at least \$2,110,640.00.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

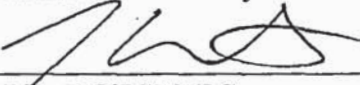
REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 25 Feb 2021

ROBERT J. HIGDON, JR.
United States Attorney


BY: J.D. KOESTERS
Assistant United States Attorney